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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

E.R. <i>guardian ad litem</i> Perla Calderon,	}	Case No. 1:21-cv-01578-DAD-GSA
Plaintiff,		STIPULATION AND ORDER
vs.		FOR EXTENSION OF TIME
Kilolo Kijakazi, Acting		
Commissioner of Social Security,		
Defendant.		

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from August 29, 2022 to September 28, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for Plaintiff's request. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR).

1 A review of the records received shows Counsel has received at least 50 CARs, the
2 majority of which were filed in June 2022.

3 Additionally, for the weeks of August 22, 2022 and August 29, 2022,
4 Counsel currently has 15 merit briefs, and several letter briefs and reply briefs.
5 Additional time is needed to thoroughly brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause.

8
9 Respectfully submitted,

10 Dated: August 9, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
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12 By: /s/ Jonathan Omar Pena
13 JONATHAN OMAR PENA
14 Attorneys for Plaintiff
15

16 Dated: August 9, 2022 PHILLIP A. TALBERT
17 United States Attorney
18 PETER K. THOMPSON
19 Acting Regional Chief Counsel, Region IX
20 Social Security Administration
21

22 By: */s/ Andrea Banks
23 Andrea Banks
24 Special Assistant United States Attorney
25 Attorneys for Defendant
26 (*As authorized by email on August 9, 2022)
27
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ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: **August 9, 2022**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE